

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY Caption in Compliance with D.N.J. LBR 9004-1(b)	
BROWN RUDNICK LLP Kenneth J. Aulet, Esq. (admitted <i>pro hac vice</i>) Seven Times Square New York, New York 10036 (212) 209-4800 kaulet@brownrudnick.com BROWN RUDNICK LLP Tristan Axelrod, Esq. (admitted <i>pro hac vice</i>) One Financial Center Boston, MA 02111 (617)856-8300 taxelrod@brownrudnick.com BROWN RUDNICK LLP Stephen D. Palley, Esq., (<i>pro hac vice forthcoming</i>) Daniel J. Healy, Esq., (<i>pro hac vice forthcoming</i>) John G. Doyle, Esq., (Attorney ID No.:045872005) 601 Thirteenth Street NW Suite 600 Washington, D.C. 20005 Telephone: (202) 536-1766 Facsimile: (617) 289-0766 spalley@brownrudnick.com dhealy@brownrudnick.com jdoyle@brownrudnick.com <i>Counsel for Plaintiff BlockFi, Inc. by and through the Plan Administrator</i>	GENOVA BURNS LLC Daniel M. Stolz, Esq. Donald W. Clarke, Esq. 110 Allen Rd., Suite 304 Basking Ridge, NJ 07920 (973) 230-2095 DStolz@genovaburns.com DClarke@genovaburns.com <i>Local Counsel for Counsel for Plaintiff BlockFi, Inc. by and through the Plan Administrator</i>
In re: BLOCKFI INC., <i>et al.</i> , Debtors. ¹	Chapter 11 Case No. 22-19361 (MBK) (Jointly Administered under a Confirmed Plan ²) Hearing Date: April 11, 2024, 10:00 a.m. Response Deadline: April 4, 2024 Oral Argument Waived Unless Response Timely Filed

¹ The Debtors in these Chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: BlockFi Inc. (0015); BlockFi Trading LLC (2487); BlockFi Lending LLC (5017); BlockFi Wallet LLC (3231); BlockFi Ventures LLC (9937); BlockFi International Ltd. (N/A); BlockFi Investment Products LLC (2422); BlockFi Services, Inc. (5965) and BlockFi Lending II LLC (0154). The location of the Wind-Down Debtors' service address is c/o M3 Partners, 1700 Broadway, 19th Floor, New York, NY 10019.

² On October 3, 2023, the Court entered an order confirming the Third Amended Joint Chapter 11 Plan of BlockFi Inc. and its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code (Additional Technical Modifications) (the "Plan") [Docket No. 1609].

**NOTICE OF THE WIND-DOWN DEBTOR BLOCKFI, INC.'S MOTION
FOR AN ORDER REMANDING STATE COURT ACTION**

PLEASE TAKE NOTICE that on **Thursday, April 11, 2024 at 10:00 a.m.** or as soon thereafter as counsel may be heard, BlockFi, Inc. as Wind Down Debtor (“**Plaintiff**” or “**BlockFi**”), by and through the undersigned counsel, shall move before the Honorable Michael B. Kaplan, United States Bankruptcy Court for the District of New Jersey, 402 East State Street, Courtroom #8, Trenton, New Jersey 08608, for entry of an Order Remanding State Court Action, and for such other and further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that a proposed form of order is submitted herewith.

PLEASE TAKE FURTHER NOTICE that all objections, if any, must be made in accordance with D.N.J. LBR 9013-2(a)(2), written objections shall be filed with the Clerk of the United States Bankruptcy Court, for the District of New Jersey, 402 East State Street, Trenton, New Jersey 08608, and a copy thereof must simultaneously be served upon GENOVA BURNS, LLC., Attn: Daniel M. Stolz, Esq., 110 Allen Road, Suite 304, Basking Ridge, New Jersey 07920

PLEASE TAKE FURTHER NOTICE that in the absence of any objections, the relief requested hereunder may be granted without further notice.

Dated: March 13, 2024

Respectfully Submitted,

By: /s/ Daniel M. Stolz

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